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13 MEDIANEWS GROUP, INC. and
14 CALIFORNIA NEWSPAPERS PARTNERSHIP

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION
18

19 CLINTON REILLY,

20 Plaintiff,

21 v.

22 MEDIANEWS GROUP, INC.; THE
HEARST CORPORATION; STEPHENS
23 GROUP INC.; GANNETT CO., INC.; and
24 CALIFORNIA NEWSPAPERS
PARTNERSHIP,

25 Defendants.

Case No. 06-CV-04332-SI

[Complaint Filed: July 14, 2006]

STIPULATION AND [PROPOSED]
REVISED CASE MANAGEMENT
ORDER

Judge: Hon. Susan Illston

Trial Date: April 30, 2007

1 WHEREAS the Court adopted the parties' proposed further case
2 management schedule in its October 11, 2006 Further Case Management Order, providing
3 for, *inter alia*, a deadline of December 22, 2006 for all parties to complete non-expert
4 depositions, and a trial date of April 30, 2007;

5 WHEREAS to make the most efficient use of the time leading up to trial, the
6 parties have met and conferred and agreed to the revised case management schedule set
7 forth below, subject to the Court's approval and availability;

8 NOW THEREFORE, pursuant to Northern District Civil Local Rules 6-2(a)
9 and 16-2(e), the parties hereby stipulate and agree to the following case management
10 schedule:

- 11 1. This schedule concerns only (a) the acquisitions of the McClatchy
12 newspapers that were the subject of the Court's Order Denying Plaintiff's
13 Application for Temporary Restraining Order; and (b) Hearst's proposed
14 equity investment in MediaNews Group's non-Bay Area properties.
- 15 2. This schedule does not concern any potential future broadening of Hearst's
16 proposed equity investment in MediaNews Group pursuant to equity
17 conversion provisions or otherwise: Hearst and MediaNews Group expect
18 that any such transaction, if it were to occur, would be the subject of future
19 antitrust Hart-Scott-Rodino Act regulatory filings. If such a transaction
20 occurs, and plaintiff elects to challenge it, the parties would propose an
21 appropriate schedule at that time.
- 22 3. The deadline for all parties to produce documents in response to non-expert
23 written discovery was November 30, 2006.
- 24 4. The deadline for all parties to complete non-expert depositions shall be
25 January 26, 2007.
- 26 5. The deadline for Plaintiff to file his expert report(s) shall be
27 March 2, 2007.


- 1 6. The deadline for Defendants to file their expert reports shall be
- 2 March 21, 2007.
- 3 7. The Court will hold a Further Case Management Conference on ~~February 28,~~ March 2,
- 4 2007 at 2:30 p.m. Counsel must file a joint case management statement
- 5 seven days in advance of the conference.
- 6 8. The deadline for all parties to complete expert depositions shall be March 30,
- 7 2007.
- 8 9. The deadline for all parties to file and serve motions in limine shall be
- 9 April 13, 2007.
- 10 10. The deadline for all parties to file and serve pre-trial conference statements
- 11 and to exchange trial exhibits and witness lists shall be April 16, 2007.
- 12 11. A pretrial conference will be held on April ~~20,~~ ²⁴ 2007 at 3:30 p.m.
- 13 12. Trial (estimated to be two weeks in length) shall commence on April 30,
- 14 2007 at 8:30 a .m.

15
16
17 IT IS SO STIPULATED.

18
19 Dated: January 3, 2007

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
KING & BALLOW

20
21
22 By


GARY L. HALLING
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MEDIANEWS GROUP, INC. and
CALIFORNIA NEWSPAPERS PARTNERSHIP

1 Dated: January 3, 2007

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11 Dated: January 3, 2007

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20 CLINTON REILLY

21 **ORDER**

22 Pursuant to the foregoing stipulation of the parties, the declaration of
23 counsel, and for good cause shown, the foregoing revised case management schedule is
24 hereby adopted by the Court. The October 11, 2006 Further Case Management Order is
25 VACATED.

26 IT IS SO ORDERED.

27 Dated: _____



28 HON. SUSAN ILLSTON
UNITED STATES DISTRICT COURT JUDGE